

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 CHAD STANBRO,

PLAINTIFF,

5 -against-

Case No.:
19-CV-10857

6 WESTCHESTER COUNTY HEALTH CORPORATION,
7 WESTCHESTER MEDICAL CENTER, FRANK WEBER,
8 AND JOHN FULL,

9 DEFENDANTS.

10 CHAD STANBRO,

PLAINTIFF,

11 -against-

Case No.:
20-cv-01591

12 C.O. NADYA PALOU, C.O. RAYMOND DEAL, C.O.
13 KRISTOPHER LEONARDO, C.O. RICHARD LANDRY,
14 CORRECTION NURSE GARY PAGLIARO, AND
15 CORRECTION SERGEANT ENRIQUE TORRES,

16 DEFENDANTS.

17
18 DATE: March 4, 2021

19 TIME: 10:00 A.M.

20
21 DEPOSITION of the Defendant,
22 RAYMOND DEAL, C.O., taken by the respective
23 parties, pursuant to an Order and to the
24 Federal Rules of Civil Procedure, held via
25 videoconference, before Victoria Chumas, a
Notary Public of the State of New York.

1
2 A P P E A R A N C E S:
3

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Also present:

Glenn Miller

Jason Miller

Andrew Weiss

* * *

F E D E R A L S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED by and between the counsel for the respective parties herein that the sealing, filing and certification of the within deposition be waived; that the original of the deposition may be signed and sworn to by the witness before anyone authorized to administer an oath, with the same effect as if signed before a Judge of the Court; that an unsigned copy of the deposition may be used with the same force and effect as if signed by the witness, 30 days after service of the original & 1 copy of same upon counsel for the witness.

IT IS FURTHER STIPULATED AND AGREED that all objections except as to form, are reserved to the time of trial.

* * * *

1 R. DEAL

2 R A Y M O N D D E A L, called as a
3 witness, having been first duly sworn by a
4 Notary Public of the State of New York, was
5 examined and testified as follows:

6 EXAMINATION BY

7 MR. SIVIN:

8 (Whereupon, PDF documents were
9 deemed marked as Plaintiff's Exhibit
10 26-29 for identification as of this
11 date by the Reporter.)

12 Q. Please state your name for the
13 record.

14 A. Raymond Deal.

15 Q. What is your address?

16 A. 18 Strack Drive, Beacon, New
17 York 12508.

18 Q. Good morning, Officer Deal.

19 A. Good morning.

20 Q. My name is Ed Sivin. I
21 represent the plaintiff in these lawsuits
22 whose name is Chad Stanbro. I'm going to
23 ask you some questions relating to an
24 incident that took place at Westchester
25 Medical Center on August 31, 2018. If for

1 R. DEAL

2 any reason you don't understand a question,
3 or you don't hear it properly, or a
4 question is unclear to you for any reason,
5 don't answer the question. Ask me to
6 repeat it or rephrase it and I will do so,
7 okay?

8 A. Okay.

9 Q. And please make sure all of
10 your answers are verbal because the court
11 stenographer can't take down hand gestures
12 or head gestures, okay?

13 A. Okay.

14 Q. Other than the tech support
15 person, is there anyone else in the room
16 that you are in now?

17 A. No.

18 Q. Are you currently employed by
19 the Department of Corrections and Community
20 Supervision?

21 A. Yes.

22 Q. What is your job title?

23 A. Correction officer.

24 Q. What facility are you at?

25 A. Fishkill Correctional Facility.

1 R. DEAL

2 Q. When did you graduate the
3 academy?

4 A. December 2012.

5 Q. Please take me through your
6 assignments with DOCCS from when you
7 graduated in 2012 until the present?

8 A. My assignments from 2012, when
9 I graduated the academy, I went to do
10 on-the-job training at Sing Sing
11 Correctional Facility. From there, I went
12 to Green Haven Correctional Facility. I
13 was a resource officer there. Meaning, I
14 didn't have a specific job. They put me
15 where they needed me. I then came to
16 Fishkill in 2013, and I have been working
17 there, I had various positions in Fishkill.

18 Q. How long were you at Sing Sing?

19 A. Two weeks.

20 Q. How long were you at Green
21 Haven?

22 A. Maybe two months.

23 Q. Other than Sing Sing, Green
24 Haven, and Fishkill have you worked at any
25 other New York State Correctional

1 R. DEAL

2 Q. Did Officer Palou tell you that
3 Officer Leonardo had trained or supervised
4 her at Greene Correction Facility?

5 A. I don't remember her saying
6 that. I remember her saying that they
7 worked together at some point.

8 Q. So I want you to describe all
9 of the force that you recall being used
10 between the time that Mr. Stanbro swung his
11 arm in your direction and yeah -- after
12 that, all of the force you recall being
13 used.

14 MR. HEINZE: Objection to form.
15 Are you asking the witness -- it also
16 dropped out on me. Are you asking
17 just what Officer Deal did or all of
18 the force that everybody used?

19 MR. SIVIN: Let me clarify
20 that.

21 Q. I would like you to describe
22 all of the force you recall being used on
23 Mr. Stanbro by yourself, Officer Deal,
24 Officer Leonardo, and anyone else.

25 A. I remember when he swung at me,

1 R. DEAL

2 like I said, I backed up. I remember
3 Officer Leonardo and Palou grabbing his
4 upper body, like around his chest area, and
5 putting him back onto the chair. And I
6 grabbed his legs because he was swinging
7 his legs, and I grabbed his legs to try to
8 get control of him.

9 Q. What other force, if any, did
10 you observe?

11 A. Other than that, no other
12 force.

13 Q. Describe the manner in which
14 Officer Palou grabbed Mr. Stanbro's upper
15 body.

16 A. I was not really paying
17 attention to what they were doing, but I
18 believe she grabbed his arm, his right arm.

19 Q. Well, when you say you weren't
20 paying attention, does that mean because
21 you were focused more on the legs?

22 A. On the legs, yes.

23 Q. Would it be fair to say that
24 when Officer Leonardo and Officer Palou
25 were using force against Mr. Stanbro that

1 R. DEAL

2 you were looking at Mr. Stanbro's legs?

3 A. Yes.

4 Q. So when you were looking at Mr.
5 Stanbro's legs, did you physically see what
6 Officer Leonardo and Officer Palou were
7 doing?

8 A. I may have glanced up, but I
9 did not really pay attention to what they
10 were doing. I was focused on trying to
11 hold the legs from going all over.

12 Q. So did you actually see how Mr.
13 Stanbro got back into the chair, or were
14 you focused elsewhere at that point, or
15 something else?

16 A. I was focused elsewhere.

17 Q. So when you say that they
18 grabbed his upper body, is this something
19 that you observed after Mr. Stanbro was
20 already back in the chair?

21 A. Yes.

22 Q. So you don't know what type of
23 force or maneuver was used by Officer
24 Leonardo or Officer Palou to get Mr.
25 Stanbro back in the chair; is that correct?

1 R. DEAL

2 A. Correct.

3 Q. But at the point that the other
4 officers had already placed Mr. Stanbro
5 back in the chair, at that point, did you
6 observe Palou and Leonardo restraining Mr.
7 Stanbro in some manner?

8 A. Can you repeat that?

9 Q. Yeah. So I know you didn't see
10 what type of force was used to get Mr.
11 Stanbro back in the chair, but you say at
12 some point you observed Palou and Leonardo
13 restrain, in some manner, Mr. Stanbro's
14 upper body, correct?

15 A. Yes.

16 Q. Describe the manner in which
17 you observed Leonardo and Palou restrain
18 Mr. Stanbro's upper body at that point.

19 A. Officer Palou had his arm and
20 the other, Officer Leonardo, was -- he had
21 the other side of his body, like around his
22 chest area.

23 Q. When you say "Officer Palou had
24 his arm," describe physically what she was
25 doing. And which arm you are referring to.

1 R. DEAL

2 A. It was his right arm, and she
3 was like holding it down to where he could
4 not continue swinging or using his hands to
5 do anything.

6 Q. Was Palou holding down his
7 right arm with both of her hands?

8 A. I don't remember. I believe
9 so, but I don't remember.

10 Q. Which portion of Mr. Stanbro's
11 right arm was Officer Palou retraining?
12 Was it closer to the shoulder, closer to
13 the wrist, the elbow, something else, a
14 combination?

15 A. Around I guess the bicep area.

16 Q. And now Officer Leonardo,
17 describe for me -- at the point when you
18 saw him restraining Mr. Stanbro, describe
19 for me what parts of his body he had on
20 what parts of Mr. Stanbro's body?

21 A. I don't remember exactly how
22 Officer Leonardo had him, but it was -- I
23 believe it was his chest area, like on the
24 opposite side, on the left side.

25 Q. Meaning, Mr. Stanbro's left

1 R. DEAL

2 side, correct?

3 A. Yes.

4 Q. What part -- what was Officer
5 Leonardo using to restrain that part of Mr.
6 Stanbro's body? Was it his arm, his leg,
7 his forearms, his hands, something else?

8 A. His hands. It was his arms,
9 his hands.

10 Q. Now, during this time when you
11 saw Stanbro [sic] and Palou restraining Mr.
12 Stanbro, were you still involved in
13 restraining Mr. Stanbro's ankles?

14 A. Yes.

15 Q. Would it be fair to say at that
16 point the focus of your attention was still
17 on Mr. Stanbro's ankles?

18 A. Yes.

19 Q. What is the next thing you
20 recall after you were restraining Mr.
21 Stanbro's ankles and Palou and Leonardo
22 were restraining the upper portion of Mr.
23 Stanbro?

24 A. I remember I had the waist
25 chain things on my waist. I kind of

1 R. DEAL

2 clipped them on my belt, so we had to put
3 the waist chains back on. But right
4 before, I got shoved by his legs into
5 something that was on the wall. It was a
6 case there that was on the wall, so I kind
7 of -- my back hit the wall. I came back
8 and that is when we started to put the
9 waist chains and everything back on him.

10 Q. When you say you were "shoved"
11 into the wall, how were you shoved into the
12 wall?

13 A. He pushed me with his feet.

14 Q. Now, at that point, his feet
15 were still in those shackles, correct?

16 A. Yes.

17 Q. And were you still holding onto
18 his feet at that point?

19 A. At that point, yes, I was.

20 Q. And you are saying his feet
21 made contact with your body?

22 A. Yes.

23 Q. What portion of your body?

24 A. My stomach area.

25 Q. When you were applying --

1 R. DEAL

2 did he appear to you to be in any physical
3 condition different than the way he was
4 before he was wheeled out to the van?

5 MR. HEINZE: Objection to the
6 form.

7 Q. You can answer.

8 MR. HEINZE: I think he is just
9 unclear. Are you referring to
10 earlier that day?

11 MR. SIVIN: Let me rephrase it.

12 Q. Did you observe any change in
13 Mr. Stanbro's physical condition? By that
14 I mean, his ability to move, whether he was
15 injured or not, or appeared to be injured
16 at any time between the point you brought
17 him into the procedure room and the point
18 that you wheeled him out of the procedure
19 room?

20 MS. COLLINS: Objection as to
21 form.

22 MR. HEINZE: You can answer.

23 A. When we brought him in, he
24 walked in, but then after the situation we
25 went through with him, like I said

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breathing hard and things, he -- I'm not a medical at all, but he just seemed to be uncooperative. I didn't think he was hurt, but I am not anything medical, so I don't know what his medical condition might have been.

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Q. Okay. Well, again, when you say he became "uncooperative," are you referring to anything other than those three events where he stood up and took a swing, and then the two other events where he fell or threw himself to the ground, is that what you are referring to by uncooperative?

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17

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A. Yes, yes.

22

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Q. But when you wheeled him out, were you under the impression that he was -- strike that. When you wheeled him out, did you believe he was able to walk on his own at that point if he wanted to?

A. If he wanted to, yeah. I do believe so, yeah.

Q. So essentially, you wheeled him out because you thought he was being

1 R. DEAL

2 uncooperative, correct?

3 A. Yes.

4 Q. Did Mr. Stanbro say anything
5 during the trip in the wheelchair from the
6 procedure room to the van?

7 A. While we were still in the
8 procedure -- not in the procedure room, in
9 the dental clinic, he said that his neck
10 bothered him.

11 Q. So this is while you were
12 wheeling him through the clinic en route to
13 the exit door?

14 A. Yes.

15 Q. And who else was present when
16 he said that his neck hurt?

17 A. My partner, Officer Palou, and
18 other people that were in the clinic. I
19 don't know anybody else.

20 Q. Other than saying his neck
21 hurt, did Mr. Stanbro say anything else
22 during the period that you wheeled him from
23 the procedure room to the van?

24 MR. FITCH: Objection to the
25 form. He said his neck bothered him.

1 R. DEAL

2 MS. WEIS: Same objection.

3 Q. Other than by saying that his
4 neck bothered him, did Mr. Stanbro say
5 anything else during the time that you
6 wheeled him from the procedure room to the
7 van?

8 A. No.

9 Q. When he told you his neck
10 bother him, did you follow up with this?
11 Ask him any questions? You know, how is it
12 bothering you? Anything to that effect?

13 A. I remember my partner, once
14 again Officer Palou, going back to the
15 phone to call the jail once again to let
16 them know what he said. I believe the
17 doctor was still present. I can't remember
18 exactly who was around us at the time.

19 Q. Well, which doctor was that?
20 Are you talking about Dr. Weber, the
21 dentist?

22 A. I can't say it was Dr. Weber or
23 one of the staff. I don't know which each
24 one of those job descriptions is, so I
25 can't say exactly who it was.

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R. DEAL

2

Q. But you say Officer Palou went
3 back into the facility; is that correct?

4

A. No. We never left. We were
5 still inside of the dental clinic. We were
6 like right outside of the door of the room.

7

Q. So you're saying that after Mr.
8 Stanbro complained about his neck inside of
9 the facility, Officer Palou made a

10

telephone call?

11

A. Yes.

12

Q. Did you see her make that call?

13

A. No. She walked off to another
14 area to make the phone call.

15

Q. Did she have a cell phone?

16

A. No.

17

Q. Did you have a cell phone?

18

A. No.

19

Q. Any reason why not?

20

A. We don't carry phones on duty.

21

Q. Are you prohibited from
22 carrying phones on duty?

23

A. Yes.

24

Q. Do you know where Officer Palou
25 went to make that telephone call?

1 R. DEAL

2 A. I don't know what area she went
3 to.

4 Q. And you didn't overhear that
5 phone call, correct?

6 A. No.

7 Q. Did she tell you what took
8 place during that phone call?

9 A. When she came back, she said
10 that we were told, once again, just to
11 bring him back to the facility, the
12 corrections facility.

13 Q. Did Officer Palou tell you that
14 she told the watch commander that Mr.
15 Stanbro was complaining of a problem with
16 his neck?

17 MS. COLLINS: Objection.

18 A. She didn't tell me what the
19 conversation was.

20 Q. After Officer Palou made the
21 telephone call, did the two of you then
22 bring Mr. Stanbro out of the hospital in
23 the wheelchair?

24 A. Yes.

25 Q. Did you then go directly to the

1 R. DEAL

2 van?

3 A. Yes.

4 Q. What happened after you arrived
5 at the van?

6 A. We helped Mr. Stanbro into the
7 van, and I don't remember which one of us,
8 we needed -- because of the incident, we
9 needed the doctor's report of the incident.
10 So we went back inside to get the report,
11 outside of his medical report, a separate
12 report that the doctor wrote describing the
13 incident.

14 Q. Who told you you needed to get
15 that type of report?

16 A. Nobody told us, but because it
17 was an incident that happened, it wasn't
18 just a standard visit after the incident,
19 we figured we needed something from the
20 doctor stating what went on, so we went
21 back in and he wrote the report up.

22 Q. I assume you didn't both go
23 back in at the same time, correct?

24 A. No. We both didn't go. I
25 don't remember which, but one stayed with

1 R. DEAL

2 the van and the inmate, and the other one
3 went back inside.

4 Q. Well, do you recall ever going
5 back into the hospital at any point after
6 you brought Mr. Stanbro to the van?

7 A. I don't remember which one of
8 us went back inside.

9 Q. Other than that one occasion
10 where one of you went back into the
11 hospital after bringing Mr. Stanbro to the
12 van, did either of you go back to the
13 hospital after bring Mr. Stanbro to the
14 van?

15 A. Outside of getting the report?

16 Q. Outside of that one occasion
17 where one of you went back.

18 A. No. We didn't after that.

19 Q. So is it fair to say that after
20 the two of you brought Mr. Stanbro to the
21 van, only one of you went back to the
22 hospital; is that correct?

23 A. Yes.

24 Q. Describe how you physically got
25 Mr. Stanbro into the van.

1 R. DEAL

2 A. We helped him up into the van.

3 Q. Tell me what he did and what
4 you did.

5 A. I don't remember exactly how
6 the whole procedure went, but I remember us
7 helping him, once again, grabbing his arm,
8 assisting him getting into the van.

9 Q. Again, was he deadweight at
10 that point? Was he able to stand up on his
11 own? Did he walk at all? Tell me exactly
12 what you recall.

13 A. I don't recall exactly what
14 went on, but we helped him. I believe we
15 grabbed his arm or helped him get into the
16 van.

17 Q. Again, your use of the word
18 "helped" makes me conclude that you mean he
19 participated to some extent. If that's
20 incorrect, tell me. Did he share or assist
21 in getting himself into the van as well?

22 A. I don't remember.

23 Q. Now, the manner in which you
24 grabbed ahold of him and placed him in the
25 van, did that differ in any manner from the

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R. DEAL

way he was brought from the floor in the dental clinic back into the chair?

MS. COLLINS: Objection. He testified several times he can't remember.

MR. SIVIN: Well, no. He can't remember what Mr. Stanbro did.

Q. I am talking about what you did. Was it essentially the same thing?

A. I don't remember.

Q. Was Mr. Stanbro in the van, at that point, was he still in the handcuffs and leg shackles with the black box?

A. Yes.

Q. Were there any type of seatbelts or shoulder harnesses or anything inside of the van?

A. Yes. There are seatbelts in the van.

Q. Which row in the van was he placed?

A. I don't remember.

Q. Tell me how, if at all, he was secured inside of the van, vis-à-vis, any

1 R. DEAL

2 seatbelts or restraints?

3 A. When we put him in the van,
4 they usually put their own seatbelt on. So
5 I don't remember. I don't think we put a
6 seatbelt on him because they usually put
7 their own seatbelts on.

8 Q. So you believe Mr. Stanbro put
9 his own seatbelt on?

10 A. Yes.

11 Q. Okay. And what type of
12 seatbelt? Is that just one that goes
13 horizontally across the waist?

14 A. I don't know that.

15 Q. Well, generally in those vans,
16 describe the type of seatbelts that are
17 there. Are they just the waist band, or is
18 there also a shoulder strap, or something
19 else?

20 A. I believe they're on the waist,
21 coming around the waist.

22 Q. Who drove back to Westchester?
23 I'm sorry. Who drove back to Fishkill?

24 A. I believe I started to drive,
25 then we switched and she drove.

1 R. DEAL

2 Q. Who drove to Westchester from
3 Fishkill earlier that day?

4 A. I drove down.

5 Q. Now, why did you guys switch on
6 the trip back?

7 A. Because if I needed to get out
8 to assist him in any kind of way, meaning
9 if he started to act up in any other way, I
10 needed to be the one that could get to him
11 as opposed to -- remember, she has the
12 weapon on, so she can't go to the back and
13 help him.

14 Q. So who is the one who initiated
15 the driving?

16 A. I did.

17 Q. And why did you do that if it
18 was Palou who had the weapon?

19 A. Because I think I started to
20 drive back because I had the van keys
21 because I was the one who drove down, so
22 when we thought about it, I said maybe we
23 should switch, so that if we need to pull
24 over, I can get right out and get to him,
25 as opposed to if I am driving, I have to

1 R. DEAL

2 worry about the vehicle as well.

3 Q. Is that the only reason you
4 switched?

5 A. Yes.

6 Q. And when you switched, I
7 assumed you stopped the van in order to
8 make the switch?

9 A. Yes.

10 Q. Did you make any other stops
11 along the way other than when you and Palou
12 switched as passenger and driver?

13 A. No.

14 Q. When you guys switched, did you
15 check up on Mr. Stanbro?

16 A. Yes.

17 Q. And how did you do that?

18 A. Opened the side door and looked
19 in at him.

20 Q. Who opened the side door?

21 A. I did.

22 Q. Was there any reason why you
23 checked up on him at that point?

24 A. Just making sure he was okay.

25 Q. And was he okay?

1 R. DEAL

2 A. I believe he was.

3 Q. Okay. Well, tell me how he
4 looked when you checked up on him when he
5 was in the van.

6 A. I don't remember exactly what I
7 saw, but I can't say how he was. I don't
8 remember that.

9 Q. Well, did he appear injured in
10 any manner?

11 A. No.

12 Q. Was he sitting straight up?

13 A. In the van, yeah. I believe he
14 was. Like I said, I don't remember what he
15 looked like.

16 Q. As part of checking up on him,
17 did you ask anything of him like how are
18 you doing, how is the neck, or anything
19 like that?

20 A. I believe I asked him if he was
21 okay, and he didn't answer.

22 Q. Now, how did you interpret his
23 not answering? Did you think he was being
24 stubborn, or that he couldn't answer, or
25 anything else?

1 R. DEAL

2 A. I don't remember that day --
3 exactly what my thoughts were that day.

4 Q. But he was sitting upright,
5 basically, when you saw him, correct?

6 A. Yes.

7 Q. At any time during the trip did
8 you observe Mr. Stanbro in any other
9 position other than sitting upright?

10 A. No.

11 Q. He never slid off the bench in
12 any manner?

13 A. I don't remember seeing him
14 slide off any bench, no.

15 Q. Was he being uncooperative in
16 any manner on the way back?

17 A. He didn't speak to us on the
18 way back.

19 Q. Other than that one occasion
20 where you opened the door to see how he
21 was, did you or Palou attempt to speak to
22 him or say anything to him?

23 A. As a normal procedure, when we
24 are driving transportation, we speak to the
25 inmates to make sure they are okay in the

1 R. DEAL

2 back. Most of the time, they will answer
3 us and say they are okay, and if they're
4 not, they will tell us if they're not, but
5 Mr. Stanbro didn't answer.

6 Q. So this is something you
7 usually do on regular intervals every five
8 minutes or 10 minutes?

9 A. Yeah, maybe a little longer,
10 but yes.

11 Q. And that's basically just to
12 monitor the inmate, correct?

13 A. Yes.

14 Q. And on the trip back to
15 Fishkill, approximately how many occasions
16 did you inquire of Mr. Stanbro back there,
17 you know, to see how is he doing?

18 A. I don't remember that.

19 Q. But on each of those occasions
20 he just didn't respond, correct?

21 A. Correct.

22 Q. Now, between the time that Mr.
23 Stanbro, you say, took a swing at you and
24 the time you got him back to Fishkill, did
25 you ever question him as to what that was

1 R. DEAL

2 Q. After Mr. Stanbro threw himself
3 onto the floor and you got him back into
4 the chair, did he make any statements or
5 comments to you?

6 A. No. He did not.

7 Q. He didn't make any comments or
8 statements at any point in time after he
9 had thrown himself onto the floor and you
10 put him back into the chair?

11 A. No. In the hallway, he said
12 his neck hurt, but putting him in the
13 chair, he had nothing to say.

14 MR. SIVIN: Late objection to
15 form to that last question. I'm
16 sorry.

17 Q. At the time that he was in the
18 procedure room with you, did he make any
19 complaints of pain?

20 A. No.

21 Q. Did you observe any injuries
22 before you exited the procedure room?

23 A. No.

24 Q. If you felt that Mr. Stanbro
25 needed medical attention prior to leaving

1 R. DEAL

2 the dental clinic, were you able to request
3 it? Meaning, would you be able to say, hey
4 DOCCS, I think something is wrong with my
5 intimate, could you take a look at him?

6 A. I guess we could, yeah.

7 Q. Did you, at that time, feel
8 there was any need to request medical
9 attention for Mr. Stanbro before you left
10 the dental clinic?

11 A. No.

12 Q. Do you recall who requested the
13 wheelchair?

14 A. No. I don't.

15 Q. Going back to the procedure
16 that you spoke about for medical clearance
17 before leaving the medical facility, is
18 this a procedure where a physician has to
19 look at an inmate before you can take him
20 away, or is it literally just your
21 paperwork procedure, or something else?

22 MR. HEINZE: Objection to form.

23 You can answer.

24 A. On a regular visit, the doctor
25 -- we are there, the doctor examines him

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R. DEAL

C E R T I F I C A T E

STATE OF NEW YORK)
: SS.:
COUNTY OF ORANGE)

I, VICTORIA CHUMAS, a Notary Public
for and within the State of New York, do
hereby certify:

That the witness whose examination is
hereinbefore set forth was duly sworn and
that such examination is a true record of
the testimony given by that witness.

I further certify that I am not
related to any of the parties to this
action by blood or by marriage and that I
am in no way interested in the outcome of
this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 24th day of March 2021.



VICTORIA CHUMAS